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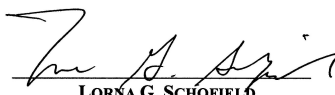
December 17, 2024

Via ECF Only

Hon. Lorna G. Schofield, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Application **GRANTED**. The deadline for fact discovery to be completed is extended to **February 7, 2025**. The deadline for expert discovery to be completed is extended to **February 18, 2025**. A Second Amended Case Management Plan will issue separately. No further extensions will be granted absent extraordinary circumstances. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 35.

Dated: December 18, 2024
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: **Ingrid Gomez v. Gastro Bar & Restaurant, Corp., et al.**
Dkt. No.: 1:24-cv-02914-LGS

Dear Judge Schofield:

This firm represents Plaintiff in the above-referenced employment action. This letter shall serve as the parties' response to the Court's December 9, 2024 Order. The Defendants' counsel has reviewed this letter and approved its contents.

By way of background, in compliance with the August 20, 2023 Amended Civil Case Management Plan and Scheduling Order, the parties made significant progress in discovery. Specifically, both parties served demands and interrogatories, and both parties responded and produced responsive documents. The remaining fact discovery on this matter are depositions. The parties propose the following new discovery schedule:

1. Plaintiff Ingrid Gomez shall be deposed on January 9, 2025 as currently scheduled by the parties.
2. Defendant John Sharma shall be deposed on or before January 31, 2025.

Plaintiff has also informed Defendant that she will be seeking mental health damages, necessitating expert discovery. Accordingly, Defendants will proceed with an IME for Plaintiff on or before February 18, 2025.

Accordingly, the parties prior request to for an additional 60 days to complete fact discovery until February 7, 2025 and expert discovery until February 18, 2025 is a realistic timeframe to complete discovery in this matter.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Diego O. Barros', is written over a horizontal line.

Diego O. Barros, Esq.

CC: Counsel for all parties (*via* ECF)